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ABSTRACT

Although the evaluation of Elementary and Secondary Education Act Title I programs was mandated with its passage in 1965, the emphasis on evaluation increased in 1974 with the incorporation of Section 151. That section was redesignated in 1978 as Section 183. Section 183 included the directive that evaluations be conducted every third year, to reduce the amount of paperwork generated by yearly evaluations; Congressman Quie moved that evaluations be made on a rotating schedule so that one-third of all school districts would report every year. Section 124(b) of the 1978 act required the yearly needs assessment of all eligible children, and the identification of instructional focus areas and of the special needs of participating children. This section incorporated regulations added by the Lawyers Committee on Civil Rights Under Law and an amendment offered by Congressman John Buchanan. The 1978 amendment also removed the absolute link between low income areas and Title I service. Evaluation was a critical issue in the Education Amendments of 1978 (Public Law 95-561), based upon recommendations made in a General Accounting Office review of the Office of Education's annual evaluation report in 1975. Continued efforts to improve Title I evaluations are expected. (GDC)

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"TOWARD GREATER UTILITY OF TITLE I EVALUATION"

The history of the incorporation of evaluation in Title I is as long as the program itself. Then Senator Robert Kennedy was responsible for having it included in the act when first passed in 1965. Kennedy apparently was concerned that without such a requirement the money might be unwisely used by school districts.

However, the really important emphasis on evaluation came in 1974 with the incorporation of what was then known as Section 151. That section was redesignated in 1978 as Section 183.

The background of the incorporation of the evaluation section in the 1974 amendment has been discussed in detail elsewhere[1] and will not be repeated today. Suffice it to say that it emerged from the frustration of Members of Congress over the lack of any credible information on what Title I had accomplished. Due to the procedure by which the amendment creating Section 151 was adopted in 1974 there was virtually no legislative history to guide either OE or the field.

Without question the adoption of Section 151 was seen as the way to accomplish several things --

A) Some saw it as the way to get data which would aggregate at the national level and give an overall picture of the accomplishments of Title I.

B) Some probably saw it as the way to prove that Title I was not accomplishing anything, hence leading to its demise or decline.

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C) Others believed that only through strengthening the capacity of SEAS and LEAS would evaluation become meaningful.

D) Some wanted evaluation data to be readily and publicly available at the local level to leverage change. It is not accidental that the same law which created Section 151 also required the creation of school level parent advisory councils. It was hoped that these PACS, as well as the school board and the public, would use evaluation data to urge program change on the school. Supporters of this strategy believed, perhaps in vain, that this would be the most effective way of bringing about change.

It shall also be noted that in the 1974 act as well as in the 1978 amendment, no mention is ever made of a mechanism like the technical assistance centers. All the law requires is that the Commissioner provide technical assistance to state agencies. (In fact the law is written in such a way that direct technical assistance from the Commissioner to LEAS is not contemplated. That assistance is to come through the SEAS.)

The 1978 amendments effecting evaluation have a checkered past.

In its zeal to cut paperwork the Administration proposed to reduce everything, primarily by requiring that most things formerly done on a yearly basis be done every three years instead. It was as if a rubber stamp was used. It was clear that no thought was given to the implication of such changes on things like evaluation.

The result was that the Administration wanted evaluation done every three years. Congressman Quie realized that such a change would mean years between the availability of good information and that when the Congress next went to examine Title I in preparation for reauthorization it might find that the only useful data was three years old. As a consequence, Congressman Quie moved to make evaluations on a rotating schedule so that one-third of all districts would report every year. The selection of which schools would be in what cycle was left to OE with the intention that each cycle would include a fair cross-section of schools of all major types (urban, rural, etc.).

The amendment in the 1978 act, Section 124(b), to require yearly needs assessment of children in all eligible areas, as well as to identify instructional focus areas and the special needs of participating children, grew from two seeds.

The first of these was the major rewrite of Title I done by request of the Chairman and Ranking Minority Member of the House Committee on Education and Labor by the Lawyers Committee on Civil Rights Under Law through the National Institute of Education.

The Lawyers Committee bill was designed to codify into the law significant parts of the regulations (which had over the years become more important than the law) and to plug some of the policy and conceptual gaps which had never been dealt with over the years. The general requirement for a needs assessment had been contained in the regulations.

The second seed was an amendment offered by Congressman John Buchanan (R-Ala.) to Title I on the House floor. That amendment changed the needs

assessment section from all served children to all eligible children.

Since the 1978 amendment also contains several options for school districts which removes the absolute link between low income areas and Title I service it is quite likely that the operative effect of the Buchanan amendment, when combined with the Quie amendment to permit service to other than only low income schools, will be to make the Quie amendment more attractive to many LEAS since they will see that the children with greatest need may not always be in the lowest income school.

Although attempts have been made to focus the purpose of the evaluation section on a single use or outcome such attempts are not consistent with either the legislative history or reality.

In looking at the legislative history of P.L. 95-561 (the Education Amendments of 1978), it is instructive to note that the House Committee report (95-1137) devotes almost 3 1/2 pages solely to the evaluation issue. It may be helpful here to review the major elements of that discussion, much of which was also incorporated in the Senate report (95-856).

Much of the report language is devoted to a discussion of a General Accounting Office review of the 1975 OE Annual evaluation report. In several instances, as we will note, the Committee specifically endorsed, and in a few cases went beyond, GAO recommendations.

The General Education Provisions Act requires that OE define program objectives and evaluate programs in terms of those objectives. GAO said that OE has seldom established specific objectives. OE responded that establishing such objectives was beyond its authority and ability.

The response of the House Education and Labor Committee, which is repeated word for word in the Senate Human Resources Committee report, is

very significant and should be read very carefully by all interested parties. In that response, HEW is admonished for not establishing the objectives "in qualitative and quantitative terms" for all programs, including Title I. In addition, the Committees virtually direct OE to initiate a dialogue with them "to seek understanding and agreement on program evaluation matters, including the specific program objective to be used for evaluation, the acceptable evaluation data needed by congressional decisionmakers and the measure to be used."

The next GAO finding referred to in the Committee reports is the adequacy of state and local evaluation reports in Title I (and Title VII) to obtain aggregated local agency data. GAO questioned whether the RMC models would yield the data and asked whether improvements might be made in the evaluation reporting system.

In its comments, the two committees virtually direct a review of the system to assure the provision of reliable program information for Federal, state and local decisionmakers and OE is told to eliminate unwarranted reporting requirements or to recommend such legislation if administrative action is not feasible. The Committees also note the inclusion of amendments to Sec. 151 requiring consultation with state and local evaluation. (This language also requires that the Commissioner's standards reflect the input of these consultations.)

The third major discussion on the GAO report deals with the issue of the types of information needed by local, state and Federal officials for policy-making. In brief, officials at the sub-Federal level find information from criterion referenced tests and information on the affective domain of most value while believing that OE officials are "most impressed by standardized norm-referenced test results." The result?; predictable, state and local

officials collect and report what they believe the Feds want rather than what they want or need (or they collect that information as well, resulting in increased reporting burdens). GAO recommended an OE review of state and local program evaluation information, including consultation and cooperation with state and local consumers of evaluation information. The two committees specifically say that such a review should include an assessment of the following:

> "--Whether it is realistic to attempt to serve Federal, State and local levels with aggregated data based on local agency evaluation reports.
> --How the information needs at the local, State, and Federal levels can best be met.
> --Whether unnecessary duplication exists or will exist in meeting Federal information requirements through the State and local reporting systems as well as through OE national evaluations on these programs, and if so, how it should be eliminated."

The final GAO recommendation addressed in the reports is that OE shall plan its evaluation so that data will be available to assist the Congress prior to and during key times in the legislative timetable and that more frequent briefings should be conducted. This is one of the oldest issues of all and both committees endorsed these points.

Finally, the Committees move beyond the GAO report to comment upon the great value of the Congressionally mandated study of Title I carried out by NIE and to note that it was not adopting the Administration proposal to have NIE administer $3 million annually in Sec. 151 funds.

The reasoning for this decision is most instructive--"(we do) not want to institutionalize a Title I evaluation bureaucracy at NIE." Instead, both Committees directed that the Assistant Secretary see to it that NIE's experience is utilized where appropriate and specifically suggests three studies, including the mandated study on comparability, as places where NIE

should be involved. Quite pointedly, both Committees also noted how helpful it was to be able to review the compensatory education study plan prior to implementation.

In summary, one may see several threads emerging from this short review:

1) Title I evaluation is multi-faceted and must serve many masters;

2) Every effort should be made to make evaluation more meaningful and to reduce redundancy and paperwork;

3) Extensive consultations should take place with state and local evaluation and policymakers and their advice should not be taken lightly; and

4) More frequent consultation should take place with the respective committees of Congress, and always in a timely fashion.

Given all of this I still expect that in 1980, 1981, 1982 and beyond AERA programs will still be sprinkled with sessions on Title I evaluation.